

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICAN,

Plaintiff,

v.

SUSAN CHEN,

Defendant.

No. 07 CR 799-5

Honorable Ronald A. Guzman

**UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRE-TRIAL RELEASE**

Susan Chen, through her counsel Neal, Gerber & Eisenberg, LLP, hereby respectfully submits her motion to modify conditions of pre-trial release so that she may travel to Connecticut to visit her grandchildren and her daughter from approximately August 31, 2008 until on or around September 15, 2008. In support of the motion, defendant states as follows:

1. On or about December 6, 2007, Susan Chen was arrested in the District of Connecticut in Hartford pursuant to a criminal complaint filed in the Northern District of Illinois. Ms. Chen has no prior criminal history.

2. On or about December 7, 2007, Susan Chen was released on bond, subject to the restriction that her travel be limited to the District of Connecticut and the Northern District of Illinois.

3. On or about January 2, 2008, Susan Chen self-reported and appeared before the Honorable Nan R. Nolan in the Northern District of Illinois. The bond was continued, but travel was restricted to the Northern District of Illinois.

4. On or about February 13, 2008, an indictment issued in the instant case.

5. Ms. Chen has complied with all the requirements of pre-trial release. It is expected that Ms. Chen's case will be resolved short of trial.

6. Ms. Chen respectfully asks that she be permitted to travel to Connecticut to visit her daughter and grandchildren.

7. United States Pre-Trial Services Officer, Carrie J. Holberg has indicated that her office has no objection to modifying the terms of pre-trial release so that Ms. Chen can visit her family in Connecticut.

8. Assistant United States Attorney Timothy Chapman has indicated that his office similarly has no objection to the requested modification of pre-trial release.

9. Upon obtaining an order permitting the requested travel, and before any such travel occurs, Ms. Chen will provide to Pre-Trial Services her daughter's address where she will be residing during her visit to Connecticut, contact numbers for her and her daughter while she is in Connecticut, and any other information requested or needed by the Court or Pre-Trial Services.

WHEREFORE, defendant Susan Chen respectfully requests that the Court modify the conditions of her pre-trial release so that she may travel to Connecticut as detailed above.

By: /s/ Michael Z. Gurland

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**ORDER MODIFYING CONDITIONS OF PRE-TRIAL RELEASE**

Susan Chen, who upon motion has sought to modify the conditions of her pre-trial release so that she may visit relatives in Connecticut, and there being no objection to same.

IT IS HEREBY ORDERED that Susan Chen's motion is GRANTED such that the conditions of pre-trial release are modified to permit travel to Connecticut in the months of August and September 2008, provided that defendant's travel itinerary and contact information is provided to Pre-Trial Services and that defendant remains in compliance with all other conditions of pre-trial release.

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Honorable Ronald A. Guzman  
United States District Judge

Dated: \_\_\_\_\_

NGEDOCs: 1550655.1